

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

EZEKIEL OCTAVIUS BROWN and
REGENAE CALHOUN,

Defendants.

CR 25-19 JRT/ECW
INDICTMENT

18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 1029(a)(3)
18 U.S.C. § 2

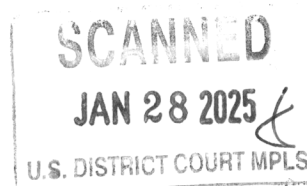
THE UNITED STATES GRAND JURY CHARGES THAT:

1. Defendants BROWN and CALHOUN operated as black-market travel agents. They booked rental cars and hotel rooms for clients using others' credit card information, which they purchased online from dark web marketplaces. They charged their clients a fraction of the actual booking costs, which their clients paid to them through peer-to-peer payment applications or in cash.

COUNT 1
(Access Device Fraud)

2. On or about June 3, 2024, in the State and District of Minnesota, the defendants,

**EZEKIEL OCTAVIUS BROWN, and
REGENAE CALHOUN**



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knowingly and with intent to defraud, possessed 15 or more unauthorized access devices, to wit, the name, address, credit card number, credit card expiration date, and card verification value code of over 200 actual persons, said possession affecting interstate and foreign commerce, and did aid and abet in the commission of said offense.

All in violation of 18 U.S.C. Sections 1029(a)(3) and 2.

COUNT 2
(Aggravated Identity Theft)

3. The allegations in paragraphs 1-2 are incorporated herein.

4. On or about June 3, 2024, in the State and District of Minnesota, the defendants,

**EZEKIEL OCTAVIUS BROWN, and
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knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, to wit, the name, address, credit card number, credit card expiration date, and card verification value code of over 200 actual persons, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c)(4), to wit, 18 U.S.C. § 1029(a)(3), knowing that the means of identification belonged to another actual person, and did aid and abet in the commission of said offense.

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

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FORFEITURE ALLEGATIONS

Upon conviction of Count 1 of this Indictment, the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1029(c)(1)(C) any property constituting, or derived from, proceeds the person obtained directly or indirectly, as the result of such violation and any personal property used or intended to be used to commit the offense.

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON